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22 UNITED STATES DISTRICT COURT

23 DISTRICT OF ARIZONA

24 In Re Bard IVC Filters Products  
25 Liability Litigation

No. MD-15-02641-PHX-DGC

**MOTION TO FILE UNDER SEAL**

**(Filed *Ex Parte*)**

26 Plaintiffs' Co-Lead Counsel and Liaison Counsel to the Common Benefit Fee and  
27 Cost Committee and the Co-Chairs of the Common Benefit Fee and Cost Committee  
28 respectfully move this Court, pursuant to Federal Rule of Civil Procedure 26(c)(1)(G) and  
Local Civil Rule 5.6 for leave to file under seal Proposed Case Management Order No. 51  
("Proposed CMO").

The Proposed CMO pertains to a confidential hearing and contains confidential  
information relevant to all fee applicants. Furthermore, as the Court is undoubtedly aware,  
all filings related to the Common Benefit Fee and Cost Committee have been filed under  
seal in this litigation. Accordingly, good cause exists for sealing the Proposed CMO.

RESPECTFULLY SUBMITTED this 8<sup>th</sup> day of October 2021.

BEUS GILBERT MCGRODER PLLC

By: /s/ Mark S. O'Connor

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 8<sup>th</sup> day of October 2021, I electronically transmitted the attached document to the Court.

/s/ Jessica Gallentine